

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY
R.J. Hughes Justice Complex
P.O. Box 116
Trenton, New Jersey 08625
Attorney for Defendants Matthew J. Platkin and Patrick J. Callahan

By: Stuart M. Feinblatt (NJ Bar # 018781979)
Assistant Attorney General
(609) 376-3202
Stuart.Feinblatt@law.njoag.gov

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
TRENTON VICINAGE**

ASSOCIATION OF NEW JERSEY RIFLE
& PISTOL CLUBS, INC., BLAKE
ELLMAN, and MARC WEINBERG,

Plaintiffs,

v.

MATTHEW PLATKIN, in his official
capacity as Attorney General of New Jersey,
PATRICK J. CALLAHAN, in his official
capacity as Superintendent of the New
Jersey Division of State Police,
RYAN MCNAMEE, in his official capacity
as Chief of Police of the Chester Police
Department, and JOSEPH MADDEN, in his
official capacity as Chief of Police of the
Park Ridge Police Department,

Defendants.

HON. PETER G. SHERIDAN

Civil Action No.
3:18-cv-10507

**NOTICE OF MOTION
TO CONSOILDATE
PURSUANT TO FED. R.
CIV. P. 42(a)**

Oral argument requested

MARK CHEESEMAN, TIMOTHY
CONNELLY, and FIREARMS
POLICY COALITION, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his
official capacity as Acting Attorney
General of New Jersey, PATRICK J.
CALLAHAN, in his official capacity
as Superintendent of the New Jersey
State Police, CHRISTINE A.
HOFFMAN, in her official capacity as
Acting Gloucester County Prosecutor,
and BRADLEY D. BILLHIMER, in
his official capacity as Ocean County
Prosecutor,

Defendants.

HON. RENEE M. BUMB

Civil Action No.
1:22-cv-4360

BLAKE ELLMAN, THOMAS R.
ROGERS, and ASSOCIATION OF
NEW JERSEY RIFLE & PISTOL
CLUBS, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his
official capacity as Attorney
General of New Jersey, PATRICK J.
CALLAHAN, in his official capacity
as Superintendent of the New Jersey
Division of State Police, LT. RYAN
MCNAMEE, in his official capacity as
Officer in Charge of the Chester Police

HON. FRED A. L. WOLFSON

Civil Action No.
3:22-cv-04397

Department, and KENNETH BROWN, JR.,
in his official capacity as Chief of the Wall
Township Police Department,

Defendants.

To: United States District Court
District of New Jersey – Trenton Vicinage
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Daniel L. Schmutter
Hartman & Winnicki, P.C.
74 Passaic Street
Ridgewood, New Jersey 07450
*Attorney for Plaintiffs Association of New Jersey Rifle & Pistol Clubs, Inc.,
Blake Ellman, Thomas Rogers, and Marc Weinberg*

Bradley Lehman
Gellert Scali Busenkell & Brown, LLC
1201 N. Orange Street, Suite 300
Wilmington, DE 19801
*Attorney for Plaintiffs Mark Cheeseman, Timothy Connelly, and Firearms
Policy Coalition, Inc.*

Kathleen N. Fennelly
McElroy, Deutsch, Mulvaney & Carpenter LLP
1300 Mount Kemble Avenue
PO Box 2075
Morristown, NJ 07962-0161
Attorney for Defendant Ryan McNamee

Mitchell B. Jacobs
Cleary Giacobbe Alfieri Jacobs, LLC
955 State Route 34
Matawan, NJ 07747
Attorney for Defendant Kenneth Brown, Jr.

Linda A. Galella
Parker McCay P.A.
9000 Midlantic Drive
Suite 300
Mount Laurel, NJ 08054
Attorney for Defendant Christine A. Hoffman

Mary Jane Lidaka
Berry, Sahradnik, Kotaz & Benson, PC
212 Hooper Avenue
PO Box 757
Toms River, NJ 08754-0757
Attorney for Defendant Bradley D. Billhimer

PLEASE TAKE NOTICE that on **December 19, 2022**, or as soon thereafter as counsel may be heard, the undersigned attorney for the Defendants, Matthew J. Platkin and Patrick J. Callahan, will move before the Honorable Peter G. Sheridan, U.S.D.J., for an Order consolidating the three above-captioned actions pursuant to Fed. R. Civ. P. 42(a) and L. Civ. R. 42.1;

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the attached brief in support of the motion.

PLEASE TAKE FURTHER NOTICE that pursuant to Fed. R. Civ. P. 78, oral argument is requested if there is opposition to the motion.

A proposed form of Order is attached.

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Stuart M. Feinblatt

Stuart M. Feinblatt
Assistant Attorney General

DATE: November 18, 2022